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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

10  
11 GOOGLE LLC,  
12 Plaintiff,  
13 vs.  
14 SONOS, INC.,  
15 Defendant.

CASE NO. 3:20-cv-06754-WHA  
Related to CASE NO. 3:21-cv-07559-WHA  
**DECLARATION OF NIMA HEFAZI IN  
SUPPORT OF GOOGLE LLC'S  
ADMINISTRATIVE MOTION TO SEAL  
PORTIONS OF ITS PATENT  
SHOWDOWN CORRECTED MOTION  
FOR SUMMARY JUDGMENT**

1 I, Nima Hefazi, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am of counsel at Quinn Emanuel Urquhart & Sullivan LLP representing  
 4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this  
 5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under  
 7 Seal Portions of its Patent Showdown Corrected Motion for Summary Judgment (“Motion”). If  
 8 called as a witness, I could and would testify competently to the information contained herein.

9 3. Google seeks an order sealing the materials as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Google’s Corrected Motion	Portions highlighted in green	Google

10 4. Google’s Corrected Motion contains references to Google’s confidential business  
 11 information and trade secrets, including details regarding source code, architecture, and technical  
 12 operation of Google’s products and functionalities that Sonos accuses of infringement. The  
 13 specifics of how these functionalities operate is confidential information that Google does not share  
 14 publicly. Thus, public disclosure of such information could lead to competitive harm to Google as  
 15 competitors could use these details regarding the architecture and functionality of Google’s products  
 16 to gain a competitive advantage in the marketplace with respect to their competing products. I also  
 17 understand that a less restrictive alternative than sealing this motion would not be sufficient be-  
 18 cause the information sought to be sealed is Google’s confidential business information and trade  
 19 secrets but is necessary to Google’s Motion.

20 I declare under penalty of perjury under the laws of the United States of America that to the  
 21 best of my knowledge the foregoing is true and correct. Executed on April 24, 2022, in Los Angeles,  
 22 California.

1 DATED: April 24, 2022

2 By: */s/ Nima Hefazi*  
3 Nima Hefazi

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15 **ATTESTATION**

16 I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the  
17 above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Nima Hefazi has  
18 concurred in the aforementioned filing.

19  
20 DATED: April 24, 2022

21 */s/ Charles K. Verhoeven*  
22 Charles K. Verhoeven

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